

Exhibit 71

Filed Under Seal

From: Ring, Rose <RRing@gibsondunn.com>
Sent: Thursday, March 10, 2022 12:12 PM
To: David Ko; Snyder, Orin; Stein, Deborah L.; Kutscher Clark, Martie; Falconer, Russ; Davis, Colin B.; Mumm, Laura C.; Buongiorno, Matt
Cc: Derek Loeser; Cari Laufenberg; Benjamin Gould; Chris Springer; Adele A. Daniel; Emma Wright; Lesley Weaver; Matt Melamed; Anne Davis; Josh Samra
Subject: RE: ADI

Hi David,

Thank you for reaching out. Apologies for the delay in responding. Having completed the ADI production last week, we've been focused on making progress on other discovery issues we have been discussing in mediation and with the Special Master.

On March 3, 2022, Facebook completed its production of ADI documents pursuant to the Special Master's orders dated December 20, 2021 and January 31, 2022. We withheld from production documents over which Facebook asserts a claim of attorney-client privilege, consistent with the parameters established by paragraph 20 of the Special Master's January 31, 2022 Order. Facebook anticipates serving the privilege log contemplated by paragraph 20.c of the order with its March 17 privilege log.

On other discovery issues, would you have time for a call early next week to continue the discussion we started in mediation on Monday regarding tracker issues P04-P12. We would also like to discuss whether we need to add another issue to the tracker relating to ADI. We have identified a couple of categories of ADI documents that are not called for by the orders. For completeness on the topic of ADI, we are considering asking the Special Master to amend the orders to address them. But we would like to discuss that with you first.

Thanks,

Rose

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From: David Ko <dko@KellerRohrback.com>
Sent: Thursday, March 10, 2022 9:29 AM
To: Snyder, Orin <OSnyder@gibsondunn.com>; Stein, Deborah L. <DStein@gibsondunn.com>; Kutscher Clark, Martie <MKutscherClark@gibsondunn.com>; Falconer, Russ <RFalconer@gibsondunn.com>; Ring, Rose <RRing@gibsondunn.com>; Davis, Colin B. <CDavis@gibsondunn.com>; Mumm, Laura C. <LMumm@gibsondunn.com>; Buongiorno, Matt <MBuongiorno@gibsondunn.com>
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Subject: RE: ADI

[WARNING: External Email]

Dear counsel,

We write to follow up on the below email we sent on Monday regarding your compliance with Judge Chhabria's February 10 order to produce documents related to ADI by March 3, 2022. Please provide the courtesy of a response today. Thank you.

David Ko
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From: David Ko

Sent: Monday, March 7, 2022 8:56 PM

To: Snyder, Orin <OSnyder@gibsondunn.com>; Stein, Deborah L. <DStein@gibsondunn.com>; Kutscher Clark, Martie <MKutscherClark@gibsondunn.com>; Falconer, Russ <RFalconer@gibsondunn.com>; Ring, Rose <RRing@gibsondunn.com>; Davis, Colin B. <CDavis@gibsondunn.com>; Mumm, Laura C. <LMumm@gibsondunn.com>; Buongiorno, Matt <MBuongiorno@gibsondunn.com>
Cc: Derek Loeser <dloeser@KellerRohrback.com>; Cari Laufenberg <claufenberg@KellerRohrback.com>; Benjamin Gould <bgould@KellerRohrback.com>; Chris Springer <cspringer@KellerRohrback.com>; Adele A. Daniel <ADaniel@KellerRohrback.com>; Emma Wright <ewright@kellerrohrback.com>; Lesley Weaver <lweaver@bfalaw.com>; Matt Melamed <mmelamed@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; Josh Samra <jsamra@bfalaw.com>

Subject: ADI

Dear counsel,

Please confirm that the ADI production ordered by Judge Chhabria by March 3 is complete. In addition, please describe categories of documents or information, if any, that you withheld from the production. Finally, please indicate when you will provide a privilege log in connection with any withheld communications pursuant to para. 20.c. of Special Master Garrie's January 31, 2022 order.

Thank you.

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